

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Southern Division)

LESLIE YAJAIRA AREVALO JAIME

Plaintiff,

v.

PRINCE GEORGE'S COUNTY,  
MARYLAND, *et al.*

Defendants.

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

**Civil No.: 8:22-cv-00200-PX**

**DEFENDANT RYAN MACKLIN'S MOTION TO STAY**

COMES NOW the Defendant, Ryan Macklin, by and through his attorneys, Christopher R. Dunn and DeCaro, Doran, Siciliano, Gallagher & DeBlasis, LLP, and submits this Motion to Stay, and in support thereof states:

1. The above-captioned matter arises from allegations of sexual assault of Plaintiff Leslie Yajaira Arevalo Jaime by Defendant Ryan Macklin on October 11, 2018, on University Boulevard near Langley Park in Prince George's County, Maryland.

2. Defendant Ryan Macklin has also been criminally charged with MD Crim Law Code § 3-303, Rape, First Degree; MD Crim Law Code § 3-304, Rape Second Degree; MD Crim Law Code § 3-322 Perverted Practice; MD Crim Law Code § 3-203 Assault, Second Degree; MD Crim Law Code § 3-308 Sex Offense, 4th Degree - Sexual Contact, in the Circuit Court for Prince George's County Maryland case number CT181406X, arising out of the same interaction with Plaintiff Leslie Yajaira Arevalo Jaime.

DeCARO, DORAN,  
SICILIANO, GALLAGHER,  
& DeBLASIS, LLP

17251 MELFORD BOULEVARD  
SUITE 200  
BOWIE, MD 20715  
TELEPHONE: (301) 352-4950  
FAX: (301) 352-8691

3050 CHAIN BRIDGE ROAD  
SUITE 300  
FAIRFAX, VIRGINIA 22030  
TELEPHONE: (703) 255-6667  
FAX: (703) 299-8548

3. On May 25, 2022, this Honorable Court issued a Scheduling Order, noting the close of discovery on October 7, 2022.

4. As stated on the attached affidavit by David Benowitz, the lead criminal defense attorney representing Officer Ryan Macklin on the criminal charges listed above filed in the Circuit Court for Prince George's County Maryland, the criminal jury trial has been recently postponed and is now scheduled to commence on Monday, March 27, 2023.

5. That requiring Defendant Ryan Macklin to testify under oath in the civil case before his criminal trial in a discovery deposition or answer interrogatories would not only violate his 5th amendment rights, but would be extremely prejudicial and detrimental to his due process rights.

6. That Defendant Ryan Macklin respectfully requests that the instant matter be stayed during the pendency of the criminal case.

7. That no party would suffer any prejudice from this matter being stayed, however, the denial of this Motion would be extremely prejudicial to Defendant Ryan Macklin and detrimental to his due process rights.

DeCARO, DORAN,  
SICILIANO, GALLAGHER,  
& DeBLASIS, LLP

17251 MELFORD BOULEVARD  
SUITE 200  
BOWIE, MD 20715  
TELEPHONE: (301) 352-4950  
FAX: (301) 352-8691

3050 CHAIN BRIDGE ROAD  
SUITE 300  
FAIRFAX, VIRGINIA 22030  
TELEPHONE: (703) 255-6667  
FAX: (703) 299-8548

WHEREFORE, the Defendant, Ryan Macklin, respectfully requests that this Court Stay this action pending resolution of the criminal case against him.

Respectfully submitted,

DeCARO, DORAN, SICILIANO  
GALLAGHER & DeBLASIS, LLP

/s/Christopher R. Dunn

Christopher R. Dunn, #05278  
17251 Melford Boulevard, Suite 200  
Bowie, Maryland 20715  
(301)352-4950  
Fax - (301)352-8691  
[Cdunn@decarodoran.com](mailto:Cdunn@decarodoran.com)  
Counsel for Defendant Macklin

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 5<sup>th</sup> day of July, 2022, I electronically filed and forwarded a copy of the foregoing Defendant's Motion to Stay to:

Timothy Maloney  
Matthew M. Bryant  
Joseph, Greenwald & Laake, P.A.  
Greenbelt Office  
6404 Ivy Lane, Suite 400  
Greenbelt, Maryland 20770  
Counsel for Plaintiff

Shelley L. Johnson  
Associate County Attorney  
Prince George's County Office of Law  
Wayne K. Curry Administration Building  
1301 McCormick Drive, Suite 4100  
Largo, Maryland 20774  
Counsel for Defendant Prince George's  
County

DeCARO, DORAN,  
SICILIANO, GALLAGHER,  
& DeBLASIS, LLP

17251 MELFORD BOULEVARD  
SUITE 200  
BOWIE, MD 20715  
TELEPHONE: (301) 352-4950  
FAX: (301) 352-8691

3050 CHAIN BRIDGE ROAD  
SUITE 300  
FAIRFAX, VIRGINIA 22030  
TELEPHONE: (703) 255-6667  
FAX: (703) 299-8548

/s/Christopher R. Dunn

Christopher R. Dunn, #05278  
Counsel for Defendant Macklin